

- 1 Q Does that code have a provision for regarding ah,
2 procedures in terminating employees?
- 3 A Not procedures, ah grounds for terminating employees.
- 4 Q Does it provide for any notice to employees ah, in any
5 -- any way?
- 6 A Yes, we ah -- what it does, I -- I don't believe it
7 provides for notice, but we notify employees ah, when
8 we are terminating them not because of the code of
9 conduct, but because of the employment contract.
- 10 Q So what about those employees who don't have contracts,
11 do they get notice?
- 12 A They do get notice, yes.
- 13 Q Are they entitled to notice?
- 14 A Just like everybody else. We give them notice as a
15 matter of practice.
- 16 Q Do we have a code of conduct here? Is that a big book
17 or just a couple of page?
- 18 A No, it's probably about 5, 6 pages only. It basically
19 states ah, the grounds for -- it basically states the
20 grounds for ah -- ah, disciplinary action.
- 21 Q Okay. Do you believe that L&T would have ah -- would
22 have to have closed if the plaintiffs were retained
23 through the term of their contract?
- 24 A I -- I -- can you repeat that?
- 25 Q Do you believe that L&T would have to close if the

1 plaintiffs were retained through the ah, term of their
2 contract?

3 A I don't think it would close because it's ah, we got
4 other activities other than...[pause]--

5 Q I guess my question is, do you think if plaintiffs --
6 having to pay plaintiffs through the unexpired term of
7 their contracts would have caused L&T to go out of
8 business?

9 A I don't think so.

10 Q Were plaintiffs ever offered a reduced contract in lieu
11 of ah, just termination?

12 A Well, I don't understand reduced contract--

13 Q Well, did you ever offer them, for example, go to them
14 and say that ah, look, we're not getting orders, so
15 we're willing to offer you a contract for three months?
16 Two more months? And then you're out?

17 A That was not done.

18 Q Now, who prepared the ah, contract form for L&T?

19 A Pardon me?

20 Q Who prepared the contract form for L&T? The plaintiffs
21 -- the one the plaintiffs used.

22 A Who prepared it?

23 MR. HILL: Yes.

24 A What do you mean, ah who prepared it. HR prepared the
25 documents, ah--